

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

FILED

NOV 4 - 2020

U.S. DISTRICT COURT-WVND
CLARKSBURG, WV 26301

UNITED STATES OF AMERICA,

v.

BRUCE HENRY SMITH,

Defendant.

Criminal No. 1:20-CR- 81

Violations: 18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 1542
42 U.S.C. § 408(a)(7)(B)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Misuse of Social Security Account Number)

On or about June 21, 2017, in Harrison County, in the Northern District of West Virginia, defendant **BRUCE HENRY SMITH**, for the purpose of obtaining something of value, and for any other purpose, and with the intent to deceive, falsely represented a number to be the social security account number assigned to him by the Commissioner of Social Security, when, in fact, such number was not the social security account number assigned by the Commissioner of Social Security to him, to wit: **BRUCE HENRY SMITH** falsely represented on a West Virginia driver's license application that his social security account number was XXX-XX-XXXX, when in fact he knew that social security account number belonged to K.R.F.; in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT TWO

(Aggravated Identity Theft)

On or about June 21, 2017, in Harrison County, in the Northern District of West Virginia, defendant **BRUCE HENRY SMITH** did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: **BRUCE HENRY SMITH** transferred, possessed and used the name, date of birth, and social security number of K.R.F. during and in relation to the felony violation of Misuse of Social Security Account Number as set forth in Count One of the Indictment, knowing that the means of identification belonged to another actual person; in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT THREE

(Misuse of Social Security Account Number)

On or about August 3, 2018, in Harrison County, in the Northern District of West Virginia, defendant **BRUCE HENRY SMITH**, for the purpose of obtaining something of value, and for any other purpose, and with the intent to deceive, falsely represented a number to be the social security account number assigned to him by the Commissioner of Social Security, when, in fact, such number was not the social security account number assigned by the Commissioner of Social Security to him, to wit: **BRUCE HENRY SMITH** falsely represented on a West Virginia driver's license application that his social security account number was XXX-XX-XXXX, when in fact he knew that social security account number belonged to C.J.P.; in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT FOUR

(Aggravated Identity Theft)

On or about August 3, 2018, in Harrison County, in the Northern District of West Virginia, defendant **BRUCE HENRY SMITH** did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: **BRUCE HENRY SMITH** transferred, possessed and used the name, date of birth, and social security number of C.J.P. during and in relation to the felony violation of Misuse of Social Security Account Number as set forth in Count Three of the Indictment, knowing that the means of identification belonged to another actual person; in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT FIVE

(False Statement in Application for Passport)

On or about April 9, 2019, in Harrison County, in the Northern District of West Virginia, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, defendant **BRUCE HENRY SMITH** did willfully and knowingly make a false statement in an application for a passport with the intent to induce and secure the issuance of a passport under the authority of the United States, that is **BRUCE HENRY SMITH** submitted a passport application with a West Virginia identification card, Ohio State birth certificate, and social security number, in the name of C.J.P., knowing in fact that his actual name was **BRUCE HENRY SMITH**; in violation of Title 18, United States Code, Section 1542.

COUNT SIX

(Aggravated Identity Theft)

On or about April 9, 2019, in Harrison County, in the Northern District of West Virginia, defendant **BRUCE HENRY SMITH** did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: **BRUCE HENRY SMITH** transferred, possessed and used the name, date of birth, and social security number of C.J. P. during and in relation to the felony violation of False Statement in Application for Passport as set forth in Count Five of the Indictment, knowing that the means of identification belonged to another actual person; in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT SEVEN

(Misuse of Social Security Account Number)

On or about April 9, 2019, in Harrison County, in the Northern District of West Virginia, defendant **BRUCE HENRY SMITH**, for the purpose of obtaining something of value, and for any other purpose, and with the intent to deceive, falsely represented a number to be the social security account number assigned to him by the Commissioner of Social Security, when, in fact, such number was not the social security account number assigned by the Commissioner of Social Security to him, to wit: **BRUCE HENRY SMITH** falsely represented on a passport application that his social security account number was XXX-XX-XXXX, when in fact he knew that social security account number belonged to C.J.P.; in violation of Title 42, United States Code, Section 408(a)(7)(B).

A true bill,

/s/

Foreperson

/s/

WILLIAM J. POWELL
United States Attorney

Brandon S. Flower
Assistant United States Attorney